

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

FILED

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CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Patrice White,

Defendant.

Case No.:

12MJ4207

DEPUTY

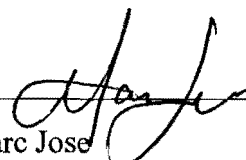
COMPLAINT FOR VIOLATIONS OF

Title 18, U.S.C. §1591(a) and (b)-  
Sex Trafficking of a Minor and by  
Force, Fraud and Coercion

The undersigned complainant being duly sworn states:

On or about October 24<sup>th</sup>, 2012 within the Southern District of California, defendant Patrice White. knowingly, in and affecting interstate commerce, did recruit, entice, harbor, transport, provide, obtain, and maintain by any means a person, to wit: Minor Female (MF), knowing and in reckless disregard of the fact that MF: (1) would be caused to engage in a commercial sex act; and (2) having had a reasonable opportunity to observe MF and knowing and in reckless disregard of the fact that MF had not attained the age of 18 years; in violation of Title 18, United States Code, Sections 1591(a) and (b).

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

  
Marc Jose  
Special Deputy U.S. Marshal

Sworn to before me and subscribed in my presence, this 16 day of November 2012.

  
U.S. MAGISTRATE JUDGE

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11/16

**PROBABLE CAUSE STATEMENT**

On November 22<sup>nd</sup>, 2011, MF ran away from her home in Virginia. Her mother reported her missing to the Virginia Beach Police Department. MF went to San Diego in March of 2012 to live with her grandmother. In June of 2012, MF ran away from her grandmother's home. Her grandmother did not report MF missing, however MF was still reported as a missing juvenile out of Virginia. MF began working for a pimp until he began physically beating her. In October of 2012, MF wanted to leave this pimp. MF began texting Larry Dean Thomas Jr. on the social website "DateHookUp". Shortly after, Thomas and MF met each other in person in San Diego. Thomas told MF she was now working for him. Thomas bought MF clothes and provided her with a house to stay at in San Diego where he introduced her to another prostitute named Patrice White. White took photographs of MF and used the photographs to post ads of her on the internet website Backpage.com. The ads were listed in the adult/escort section of the website. Thomas gave MF several instructions on how to work as a prostitute. Thomas told her not to date or talk to other black men, and to always use condoms. Thomas also instructed her to have the dates send photographs of them so he could screen them first. Approximately two weeks ago MF was on her period. Thomas instructed her to stuff cosmetic pads in her vagina to stop the bleeding so she could keep working. White provided the cosmetic pads to MF. Several days after working in this condition, MF began to have vaginal pain. Thomas and White brought MF to Kaiser Hospital for help however when the nurses began to ask questions about her age and wanted to notify her parents of her condition they took her from the hospital and Thomas continued to have MF work for him.

On October 16<sup>th</sup>, 2012 MF's uncle reported to San Diego Police that he had discovered the escort ads of MF on Backpage and that she had run away from her grandmother's house. On October 24<sup>th</sup>, 2012, San Diego Police Detective V. Bales #5873 received this information. He contacted the grandmother of MF who confirmed MF had run away again and he was given the cell phone number of MF. Detective Bales checked Backpage and found an ad, #11776975, for MF which listed her phone number. I was informed of this case and San Diego Police Detective

1 E. Drilling #5430 called the ad and arranged to have MF meet him at room #37 of the Main  
2 Street Hotel, located at 3494 Main Street in San Diego. Other detectives and I set up around the  
3 area of the Main Street Hotel for surveillance. At approximately 1750 hours, a black Dodge  
4 Charger bearing license plate #5YOV593 dropped off a female near the hotel at Thor Street and  
5 3500 Dalbergia and then left the area. I saw that the driver of the black Charger was a black  
6 male with dreadlocks.

7 The female who exited the black Charger walked to room #37 and met with Detective  
8 Drilling. After Detective Drilling obtained a verbal agreement for a sexual act for money she  
9 was arrested for prostitution and was identified as MF. In her possession was a cell phone.  
10 Detective Drilling looked in the message log of the cell phone and determined there were several  
11 messages indicative to pimping and prostitution between MF and a contact listed as "Kim".  
12 Detective Drilling used the cell phone to portray himself as MF by sending a text message to  
13 Kim saying the customer wanted anal sex. Kim replied by giving the instruction to charge him  
14 \$300 for the anal sex. After approximately 20 minutes, Detective Drilling sent another message to  
15 Kim saying the date was done. MF told Detective Drilling that she was instructed by Thomas  
16 that he would pick her up at the same place he dropped her off at. At approximately 1845 hours  
17 the black Dodge Charger returned and parked on 3500 Dalbergia where patrol officers stopped  
18 him. I saw that the driver of the Dodge Charger was the same black male with dreadlocks that  
19 dropped off MF earlier. The driver was arrested and identified as Larry Dean Thomas Jr. In  
20 Thomas' pants pocket was the California driver's license and Social Security card for MF.

21 Thomas was transported to San Diego Police Headquarters. Detective Bales admonished  
22 Thomas who stated that he knew MF was working as a prostitute and he drove her to her dates  
23 and was her protection while she was working. Thomas said that just before he dropped off MF  
24 at the hotel she gave him her ID cards and told him she was 17 years old. Thomas said that he  
25 would get paid 50% of the money MF made as a prostitute for driving her to dates. Thomas also  
26 admitted to getting a prepaid credit card that was used to post ads of MF on Backpage and that  
27 he had sent the message to charge \$300 for anal sex to MF's cell phone.

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1 MF was also transported to San Diego Police Headquarters where she told Detective  
2 Bales that Thomas had brought her to a house on 3100 Imperial Avenue in San Diego where she  
3 was introduced to the female who had taken photos of her and posted her on Backpage. MF  
4 described this female as a black female in her twenties who goes by the name "Bam" and said  
5 she thought her real name was Patrice. Detective Bales transported MF to 3100 Imperial Avenue  
6 to point out the house she was taken to. MF pointed to the house at 3146 Imperial Avenue. A  
7 computer ARJIS check of this address showed recent contacts for one black female, Patrice  
8 White, (DOB 08/22/1988), which was similar to the description of the female that MF gave to  
9 Detective Bales. Detective Bales checked the California DMV computer system and found  
10 driver's license #D4424415 for Patrice White. Detective Bales showed MF the driver's license  
11 photograph of White. MF positively identified White as the female who took photographs of  
12 her, gave her the cosmetic pads, and posted her on Backpage. Detective Bales requested  
13 subpoenas for the Backpage ads for MF. The subpoenas revealed Patrice White name was on  
14 several of the Backpage advertisement accounts.

15 On October 25<sup>th</sup>, 2012, Detective Bales located an escort ad of Patrice White. He called  
16 the listed phone number and informed her that he wanted to speak with her about an  
17 investigation. White voluntarily came to San Diego Police Headquarters and met with Detective  
18 Bales. White admitted to Detective Bales that she took the photographs of MF, created, the  
19 escort ads of MF and posted these ads on Backpage. White also admitted to providing MF with  
20 condoms and providing her with the cosmetic make up pads when she was on her period.